

1. A judicial determination declaring the rights of Plaintiff and Class members and the corresponding responsibilities of Defendants;
2. A declaration that Defendants are to be financially responsible for the costs and expenses of a Court-approved notice program by mail, broadcast media, and publication designed to give immediate notification to Class members;
3. Disgorgement and/or the imposition of a constructive trust upon Defendants' ill-gotten gains, thereby freezing Defendants' assets, and/or requiring Defendants to pay restitution to Plaintiff and Class members of all funds acquired by means of any act or practice declared by this Court to violate federal or state statutes or to constitute unfair methods of competition or unfair or unconscionable acts or practices in the course of trade.

E. Award Plaintiff and the Class their costs of suit, including reasonable attorneys' fees as provided for by law.

XII. DEMAND FOR JURY TRIAL

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff, on behalf of itself and the Class, demands a trial by jury on all issues so triable.

Dated:

Edelson & Associates, LLC

By: 

Marc H. Edelson, Esq.
3 Terry Drive, Suite 205
Newtown, PA 18940
(215) 867-2399
(267) 685-0676 (fax)
medelson@edelson-law.com

Paul J. Scarlato, Esq.
GOLDMAN SCARLATO &
PENNY, P.C.
8 Tower Bridge, Suite 1025
161 Washington Street
Conshohocken, PA 19428
Tel: (484) 342-0700
Fax: (484) 580-8747
scarlato@lawgsp.com
*Counsel for Plaintiff Philadelphia
Federation of Teachers Health and
Welfare Fund and the Proposed
Classes*